1 2 3 4 5 6	The Law of Offices of Tom Chia-Kai Wan Tom Chia-Kai Wang (SBN 269050) 117 West 9th St., Suite 206 Los Angeles, CA 90015 Telephone: (213) 290-0930 Facsimile: (213) 622-0335 Attorneys for Defendants Chetan Narsude, Kulasooriya, Monvia LLC and New Moon	, Mani LLC	
7	UNITED STATES DISTRICT COURT		
8	NORTHERN DISTRICT OF CALIFORNIA		
9	SAN FRANCISCO DIVISION		
10			
11	SUZANNE D. JACKSON,	Case No. 3:11-cv-02753-JSW	
12	Plaintiff,	STIPULATION AND [PROPOSED]	
13	v.	ORDER GRANTING LEAVE TO EXCEED PAGE LIMITS ESTABLISHED BY THE COURT'S	
14	WILLIAM FISCHER; JON SABES; STEVEN SABES; DAVID	CIVIL STANDING ORDERS	
15	GOLDSTEEN; MARVIN SIEGEL; BRIAN CAMPION; LONNIE		
16	BROOKBINDER; CHETAN NARSUDE; MANI KULASOORIYA;		
17	JOSHUA ROSEN; UPPER ORBIT, LLC; SPECIGEN, INC.; PEER		
18 19	DREAMS INC.; NOTEBOOKZ INC.; ILEONARDO.COM INC.; NEW MOON LLC: MONVIA LLC: and		
20	MOON LLC; MONVIA LLC; and SAZANI BEACH HOTEL,		
21	Defendants.		
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STIPULATION AND [PROPOSED] ORDER GRANTING LEAVE TO EXCEED PAGE LIMITS ESTABLISHED BY THE COURT'S CIVIL STANDING ORDERS

1 2 3 4 5 6 7 8 9 10 11 12 13 14	Plaintiff Suzanne Jackson and Defendants Chetan Narsude, Mani Kulasooriya, Monvia LLC and New Moon LLC (collectively "Defendants"), by and through their counsel, and subject to the Court's approval, stipulate as follows: WHEREAS, Plaintiff filed a First Amended Complaint ("FAC") on December 5, 2011; WHEREAS, the FAC asserts purported federal securities fraud and common law claims related to Plaintiff's investments; WHEREAS, the FAC alleges, inter alia, that Defendants engaged in a comprehensive scheme to defraud Plaintiff in violation of the Securities Exchange Act of 1934 and the Securities Act of 1933 and by failing to provide and failing to disclose material facts, which purportedly constitute common law fraud; WHEREAS, the parties agree that the FAC's scope and complexity warrant a modest increase in the page limits imposed by this Court's Civil Standing Orders for				
5	Defendants' opening brief and Plaintiff's opposition brief to Defendants' motion to dismiss, but that the page limit for Defendants' reply brief shall remain 15 pages;				
16	NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY				
17	AND BETWEEN THE PARTIES, subject to the Court's approval, that:				
18 19 20 21 22	 Defendants' memorandum of law in support of their motion to dismiss shall exceed 25 pages; and Plaintiff's memorandum of law in opposition to Defendants' motion to dism shall not exceed 25 pages. 				
23 24	Dated: January 4, 2012 KAUFMAN LLC				
25	By: <u>/s/ Alan H. Kaufman</u>				
26	Alan H. Kaufman				
27 28	Attorneys for Plaintiff Suzanne D. Jackson				
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II.	STIPLI ATION AND IPROPOSEDLORDER GRANTING LEAVE TO EXCEED PAGE LIMITS				

Casse 2:111-cv-02753-95W Doocumeent 59 Filed 01/04/12 Page 330654

1	Dated: January 4, 2012	THE LAW OFFICES OF TOM CHIA-KAI WANG
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3		By: /s/ Tom Chia Kai Wang
4		Tom Chia Kai Wang
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6		Attorneys for Defendants Chetan Narsude, Mani
7		Kulasooriya, Monvia LLC and New Moon LLC
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1	[PROPOSED] ORDER					
2	Having reviewed the above stipulation, IT IS HEREBY ORDERED that the page					
3	limits for the motion to dismiss briefing in this matter shall be:					
4	Defendants' motion to dismiss:	25 pages				
5	Plaintiff's opposition to Defendants' motion to dismiss	25 pages				
6						
7	PURSUANT TO THE STIPULATION, IT IS SO ORDERED.					
8	0.11					
9	Dated: January _5_, 2012					
10	The Honorable Jeffrey S. White					
11	United States District Judge					
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